

WMP-Enforcement

27.085 SKF AUTOMOTIVE

JOHN ASHCROFT
Governor

G. TRACY MEHAN III
Director



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DIVISION OF ENVIRONMENTAL QUALITY

ST. LOUIS REGIONAL OFFICE

10805 Sunset Office Drive, Suite 100

St. Louis, MO 63127-1017

314-822-0101

Fax No. 314-822-0943

May 14, 1991

Mr. C. William McGlocklin
Corporate Environmental Manager
SKF USA, Inc.

1100 First Avenue

King of Prussia, PA 19406-1352

L.O.W. #91-SL.024

Dear Mr. McGlocklin:

Enclosed, please find a report of a hazardous waste management inspection conducted at SKF Automotive Products by Mr. Bob Carlson of my staff on April 23, 1991.

Please note that the section titled "UNSATISFACTORY FEATURES" lists violations noted during the inspection, and the "RECOMMENDATIONS" section outlines steps the inspector has determined will correct those violations.

In order to document that corrective actions have been taken, you are requested to submit a written response no later than June 21, 1991. The response should describe the steps taken to correct each of the unsatisfactory features identified. Please direct the response to Mr. Carlson. You should also forward a copy of your response and supporting documentation to Mr. Bruce Martin, Chief - Hazardous Waste Enforcement, Waste Management Program, P. O. Box 176, Jefferson City, MO 65102.

It is our purpose by this letter to persuade you to take all necessary actions to comply with the Missouri Hazardous Waste Management Law. Failure to achieve timely resolution of violations may result in the referral of this case for enforcement action by the Waste Management Program.

Should you have any questions, or wish to confer in this matter, please contact Mr. Carlson.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Robert S. P. Eck
Robert S. P. Eck
Regional Administrator

RSPE/BC:ps

Enclosure

cc: Waste Management Program - Enforcement
Mr. Don Kerns, WMP - Permits

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WASTE MANAGEMENT PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES



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RESOURCE CONSERVATION AND RECOVERY ACT
AND
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

SKF Automotive Products
2320 Marconi Avenue
St. Louis, MO 63110

EPA ID #: MOT300010345
MO Generator ID: 01115

Participants

Department of Natural Resources
(MDNR)

Mr. Bob Carlson
Environmental Specialist
St. Louis Regional Office

Introduction

An inspection of SKF Automotive Products, located at the above address, was conducted on April 23, 1991. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended. The inspection was confined to facets of the operation relevant to hazardous waste management.

Facility Description

The Marconi Avenue SKF facility has been closed since July, 1986, and the property was sold soon afterward. The current occupants of the different buildings have not changed since Mr. Kerwin Singleton's report of March 17, 1989. Building # 1 is still vacant, and possibly Building # 3 also, as no waste materials could be viewed through the windows.

The facility repeatedly requested a reclassification from interim status to generator only, in letters sent over several years. This was achieved for the SKF Foundry in Washington, Missouri, but not for the St. Louis facility. Various company representatives certified in letters to EPA Region VII and the MDNR Waste Management Program (WMP) that the facility had not used its interim status. However, Mr. Gaurang Shah's inspection report of September 10, 1984, indicated that hazardous waste had been stored for over 90 days, which would constitute use of interim status. This information was attributed to statements made by facility representatives during the inspection.

Until a decision is made by the WMP whether or not to cancel the facility's interim status, the requirements under 40 CFR 265 as incorporated in 10 CSR 25-7.265 still apply.

Unsatisfactory Features:

1. Failure to have closure documentation certified by an independent registered professional engineer, in violation of 10 CSR 25-7.265(2)(G), incorporating by reference 40 CFR 265.115. This certification was first requested by Mr. Singleton in a letter dated December 15, 1988. An engineer involved with the Environmental Risk Assessment by Risk Science International (RSI) might be able to provide this certification.
2. Failure to document financial assurance for sudden accident liability, in violation of 10 CSR 25-7.265(2)(H), incorporating by reference 40 CFR 147(a). This was requested by Mr. Shah in the 9-10-84 report. A letter from Mr. Joseph Palovchik dated October 30, 1984, stated that this documentation would be submitted, but a copy was not found in the file at this office.

Comments

The unresolved matter of the facility's interim status has been brought to the attention of Mr. Don Kerns of the Permits Section, WMP. Should SKF wish to pursue cancellation, Mr. Shah's report of storage over 90 days must be addressed. In the meantime, and without delay, steps must be taken to address the unsatisfactory features listed above. If RSI cannot provide an engineering certification, then a current engineer's review of the closure event may be required. This certification also must address the underground storage tanks.

Recommendations

1. Contact Mr. Don Kerns at (314)751-3176. Mr. Kerns will determine what specific steps must be taken to gain compliance, and how to resolve the interim status issue.
2. Contact Risk Science International to determine if an engineer's certification of closure may be obtained.
3. Determine if liability coverage during the interim status period met the requirements.
4. Copy this office and the WMP on the above correspondence and documentation.

PREPARED BY:

ST. LOUIS REGIONAL OFFICE



Bob Carlson
Environmental Specialist II

BC:ps

HAZARDOUS WASTE TREATMENT/STORAGE/DISPOSAL FACILITY
Interim Status Checklist

Form IS-INSP
(10-15-88)

Name of Facility: SKF Automotive Products Date: 4-23-91
Off-Site Facility? y n I.S. for:
Address: 2320 Marconi Avenue Other Inspections Done:
St. Louis, MO 63110 RR TRANS LDR
OTHER
Phone: () N/A MO ID# 01115 EPA ID# MO T300010345
Facility Representative: N/A Title: N/A

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

facility has been closed since 1986, but issues of
proper closure + financial assurance documentation.
At issue is whether SKF ever actually made use of its
interim status by storing hazardous waste over 90 days.
No changes since Kerwin Singleton's 12-13-88 inspection were noted.

↑ report dated 3-17-89

List of wastes generated. (Use continuation sheet, if needed.)

| | <u>Waste</u> | <u>Amount/Month</u> | <u>Disposition</u> |
|----|-----------------------------|-----------------------------|-----------------------------|
| 1. | <u>N/A</u> | <u> </u> | <u> </u> |
| 2. | <u> </u> | <u> </u> | <u> </u> |
| 3. | <u> </u> | <u> </u> | <u> </u> |
| 4. | <u> </u> | <u> </u> | <u> </u> |
| 5. | <u> </u> | <u> </u> | <u> </u> |

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WASTE MANAGEMENT PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

N/A

N/A

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND (D)

Generator's MO and EPA I.D. Numbers. ()
Manifest document number (MO I.D. & Shipment #). ()
EPA Waste I.D. codes ()
Generator's name, address, phone # ()
All Transporters' names, phone #'s, MO and EPA I.D. #'s. ()
Designated facility name, address, phone # and MO and EPA I.D. # ()
Proper DOT Shipping Name, Hazard Class and I.D. # ()
Containers, Quantity and Unit Wt/Vol being shipped properly designated . ()
Proper certification including waste minimization. ()
Manifest properly signed and dated ()
No more than 10 days time between generator and facility signatures. . ()
Manifests returned within 35 days. ()
If not, exception generator report submitted within 45 days. ()
Completed manifests and Summary Manifest Report and Certification. . . ()
Spills of reportable quantities reported to DNR. ()

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)1

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. ()
Placards available for use by transporters ()
Satellite accumulation requirements met (if applicable). ()
a. Stored in satellite areas less than 1 year. ()
b. Containers marked identifying contents and beginning date ()
c. Containers kept closed/compatible/good condition. ()
d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hazardous waste). ()

C. WASTE ANALYSIS 10 CSR 25-7.265(2) AND 7.264(2)(B)

Waste analysis plan. ()
Identify hazardous wastes handled at facility. ()
Means to confirm wastes received from off-site ()

D. SECURITY 10 CSR 25-7.265(1) AND 7.265(2)(B)

24-hour surveillance system at facility or
An artificial or natural boundary/controlled access. ()
Restricted access sign posted at each entrance ()
Legible from a distance of 25 feet ()

Briefly describe waste streams managed at each TSD process.

| <u>Waste</u> | <u>Amount/month</u> | <u>Process</u> | <u>Design Capacity</u> |
|--------------|---------------------|----------------|------------------------|
| N/A | | | |
| | | | |
| | | | |
| | | | |

E. GENERAL INSPECTION 10 CSR 25-7.265(2) AND 7.265(2)(B)

Facility inspected and maintained. ()
Inspection log and written schedule for inspecting ()
Inspect emergency equipment. ()
Inspect security devices ()
Inspect operating and structural equipment ()

J. MANIFEST, RECORDS, REPORTING 10 CSR 25-7.265(2) AND 7.265(2)(E)
For off-site facilities

Manifests signed and dated ()
Copy to transporter. ()
Copy to generator in 30 days ()
Copy at facility for 3 years ()

Operating record

Description, quantity, and TSD process for all hazardous wastes. ()
Location and quantity of all hazardous waste ()
Waste analysis records from off-site sources ()
Summary and description of emergency incidents ()
Record of inspections. ()
Monitoring, testing and analytical results if necessary. ()

F. PERSONNEL TRAINING 10 CSR 25-7.265(2) AND 7.265(2)(B)

Documentation of hazardous waste director's qualifications or training ()
Completed classroom or on-the-job training ()
Job title, description, and name of person filling position. ()
Written record of the type and amount of training given. ()
Documentation confirming that training has been given. ()

Reporting

Unmanifested waste reports for off-site facilities ()
Reports for emergencies, spills, closure ()

K. INTERIM STATUS CONTAINERS 10 CSR 25-7.265(2) AND 7.265(2)(I)

Containers closed and in good condition. ()
Containers made of materials compatible with hazardous wastes placed in them ()
Hazardous waste containers storage area inspected once a week. ()
Inspection log ()
Containers holding ignitable or reactive waste at least 50 ft. from the property line. ()
Incompatible waste placed in different containers. ()
Are storage containers holding hazardous waste which are incompatible with nearby materials separated by dikes, berms, walls, or other devices. ()
Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-7.265(2)(I). ()

L. INTERIM STATUS TANKS - 10 CSR 25-7.265(2) AND 7.265(2)(J)

M. INTERIM STATUS SURFACE IMPOUNDMENTS 10 CSR 25-7.265(2) AND 7.265(2)(K)

2 ft. of freeboard in surface impoundment. ()
Earthen dikes have protective covers ()
New additions, replacements, or expansions of existing surface impoundments designated with double liner and leachate system ()
Waste analyses conducted or written documentation obtained before placing a substantially different hazardous waste into a surface impoundment used for storage or treatment ()
Freeboard level inspected each operating day ()
Dikes & vegetation inspected weekly for leaks, deterioration or failures ()
Inspections recorded in inspection logs. ()
Waste treated, rendered or mixed so that mixture no longer meets the definition of ignitable or reactive. ()
Incompatible wastes segregated in separate surface impoundments. ()

G. PREPAREDNESS AND PREVENTION 10 CSR 25-7.265(2) AND 7.265(2)(C)

Internal communication or alarm system ()
Device in the hazardous waste operation area capable of summoning emergency assistance ()
Fire control, spill control, and decontamination equipment available ()
Adequate water supply for fire control equipment ()
Adequate and proper safety equipment available ()
Adequate aisle space ()
Arrangements with local emergency agencies ()

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-7.265(2) AND 7.265(2)(D)

Contingency plan ()
Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste ()
Describe formal arrangements with emergency agencies ()
Names, addresses and phone numbers (home & office) of emergency coordinators ()
Emergency equipment including its description and location ()
Evacuation plan if applicable. ()

I. WASTE OIL 10 CSR 25-11.010

Waste oil properly handled ()
Written waste oil contract maintained. ()

- N. GROUNDWATER MONITORING 10 CSR 25-7.265(2) AND 7.265(2)(F) *N/A*
 Applicable to surface impoundments, landfills and landfills
- Groundwater monitoring wells installed ()
- Wells are structurally sound ()
- Sampling and analysis plan on-site ()
- Samples and groundwater levels taken ()
- Groundwater monitoring results kept. ()
- O. CLOSURE AND POST-CLOSURE 10 CSR 25-7.265(2) AND 7.265(2)(G)
- Closure plan for facility. ()
- Description of how and when facility will be closed. ()
- Estimate of maximum inventory of hazardous waste ()
- Steps to decontaminate equipment ()
- Post-closure plan for disposal facilities only ()
- P. FINANCIAL REQUIREMENTS 10 CSR 25-7.265(2) AND 7.265(2)(H)
- Cost estimate for facility closure ()
- Financial assurance for closure and post-closure ()
- Liability for sudden accidents ()
- Liability for non-sudden accidents for disposal only ()

COMMENTS: referred to Don Kerns, WMP permit section,
for review.

Inspector Signature & Title: *Not L W ESTE*

Office: *SLRD*

IN COMPLIANCE (✓)

IN VIOLATION OR
 ABSENT ()